

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CLOVER HEALTH INVESTMENTS  
CORP., AND CLOVER HEALTH LLC,

Plaintiff,

v.

ZOE FARRELL,

Defendant.

Hon. Kevin McNulty, U.S.D.J.  
Hon. Steven C. Mannion, U.S.M.J.

Civil Action No. 18-16802

**NOTICE OF MOTION TO SEAL  
MATERIALS**

To: Tanvir Rahman  
Wigdor LLP  
85 Fifth Avenue  
New York, NY 10003  
*Attorneys for Defendant Zoe Farrell*

**PLEASE TAKE NOTICE** that on January 22, 2019, or on such date and time as counsel may be heard, Plaintiffs Clover Health Investments Corp. and Clover Health LLC (collectively, “Clover”) by and through their undersigned attorneys, K&L Gates LLP, shall move before the Honorable Steven C. Mannion pursuant to Fed. R. Civ. P. 26 and L. Civ. R. 5.3 for the entry of an Order sealing Clover’s Complaint in the instant action (ECF No. 1).

**PLEASE TAKE FURTHER NOTICE** that Clover shall rely upon the declaration of Anthony P. La Rocco submitted herewith, and on all other pleadings and memoranda on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**K&L GATES LLP**

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*Attorneys for Plaintiffs  
Clover Health Investments Corp. and  
Clover Health LLC*

By: /s/ Anthony P. La Rocco  
Anthony P. La Rocco

Dated: December 18, 2018